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DEBORAH RODRIGUEZ

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION**

DEBORAH RODRIGUEZ, individually  
and as a representative of a class of  
participants and beneficiaries on behalf  
of the Intuit Inc. 401(k) Plan,

Plaintiff,

v.

INTUIT INC.; THE EMPLOYEE  
BENEFITS ADMINISTRATIVE  
COMMITTEE OF THE INTUIT INC.  
401(K) PLAN; and DOES 1 to 10  
inclusive,

Defendants.

Case No. 5:23-cv-05053-PCP

**NOTICE OF MOTION AND MOTION  
FOR PRELIMINARY APPROVAL  
OF CLASS ACTION SETTLEMENT**

Date: July 17, 2025

Time: 10:00 a.m.

Courtroom: 8

**TO THE COURT, ALL PARTIES, AND THEIR COUNSEL OF RECORD:**

**PLEASE TAKE NOTICE THAT** on July 17, 2025 at 10:00 a.m. in Courtroom 8 of the San Jose Courthouse for the United States District Court for the Northern District of California, located at 280 South 1<sup>st</sup> Street, San Jose, CA 95113, the Honorable P. Casey Pitts presiding, Plaintiff Deborah Rodriguez (“Plaintiff”) will and hereby does move for entry of an Order:

1. Preliminarily approving the terms of the Class Action Settlement Agreement (“Settlement”) – which is submitted concurrently herewith as Exhibit 1 to the Declaration of Matthew B. Hayes – as fair, reasonable, and adequate;

2. Conditionally certifying the following proposed Rule 23 class (hereafter “Settlement Class”) for purposes of the Settlement only:

All persons who participated in the Intuit Inc. 401(k) Plan at any time from January 1, 2018 through December 31, 2021 (“Class Period”) and had Plan expenses charged to their accounts, excluding members of The Employee Benefits Administrative Committee, including (a) any Beneficiary of a deceased Person who (i) participated in the Plan at any time during the Class Period and had Plan expenses charged to his or her account or (ii) participated in the Plan before the Class Period and whose beneficiary had an Account in the Plan during the Class Period and had Plan expenses charged to his or her account, and (b) any Alternate Payee of (i) a Person subject to a QDRO who participated in the Plan at any time during the Class Period and had Plan expenses charged to his or her account or (ii) a Person subject to a QDRO who participated in the Plan before the Class Period whose Alternate Payee had an Account in the Plan during the Class Period and had Plan expenses charged to his or her account.

- 1           3.     Appointing Plaintiff as representative of the Settlement Class;
- 2           4.     Appointing Hayes Pawlenko LLP as class counsel for the Settlement
- 3 Class;
- 4           5.     Approving the manner and content of the notice of settlement prescribed
- 5 by the Settlement as constituting the best notice practicable under the circumstances
- 6 and in compliance with the requirements of due process;
- 7           6.     Appointing Analytics Consulting LLC as the settlement administrator
- 8 and directing the settlement administrator to disseminate notice in accordance with
- 9 the Settlement; and
- 10          7.     Scheduling a final fairness hearing on the question of whether the
- 11 proposed Settlement should be finally approved.

12           The motion is unopposed by Defendants and will be based on this Notice, the

13 Memorandum of Points & Authorities filed concurrently herewith, the Declaration of

14 Matthew B. Hayes and exhibits thereto filed concurrently herewith, the Proposed

15 Order Granting Preliminary Approval submitted concurrently herewith, the records

16 on file in this action, and any additional arguments or evidence presented to the

17 Court in advance of the hearing.

18                   DATED: May 16, 2025

**HAYES PAWLENKO LLP**  
/s/Matthew B. Hayes  
Attorneys for Plaintiff